

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

HELLAS TELECOMMUNICATIONS
(LUXEMBOURG) II SCA,

Debtor in a Foreign Proceeding

ANDREW LAWRENCE HOSKING and BRUCE
MACKAY, in their capacity as joint compulsory
liquidators and duly authorized foreign
representatives of HELLAS
TELECOMMUNICATIONS (LUXEMBOURG) II
S.C.A.,

Plaintiffs,

-against-

TPG CAPITAL MANAGEMENT, L.P., *et al.*,

Defendants.

Chapter 15

Case No. 12-10631 (MG)

Adv. Pro. No. 14-01848 (MG)

**ORAL ARGUMENT
REQUESTED**

**NOTICE OF DEFENDANTS' MOTION TO WITHDRAW
THE REFERENCE TO THE BANKRUPTCY COURT**

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure and Rule 5011-1 of the Local Rules of the Bankruptcy Court, and upon the accompanying declaration of Michele L. Angell and exhibits thereto and the accompanying memorandum of law, all defendants (the “Defendants”) in the above-captioned adversary proceeding (the “Adversary Proceeding”), by and through their undersigned attorneys, hereby move the United States District Court for the Southern District of New York (the “District Court”) for entry of an order withdrawing the reference of this Adversary Proceeding to the United States Bankruptcy Court for the Southern District of New York, and for such other and further relief as the District Court deems just and proper.

The Defendants have made no prior request to any court for the relief requested by this

Motion. The Defendants respectfully request oral argument on this Motion.

Dated: New York, New York
February 1, 2016

By: /s/ Paul M. O'Connor III

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Respectfully submitted,

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